

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

INTERNATIONAL UNION,
UNITED MINE WORKERS OF
AMERICA,

Appellant,

v.

CONSOL ENERGY INC., AND ITS
WHOLLY OWNED SUBSIDIARIES,
ET AL.,

Appellees.

No. 22-7110

STATEMENT OF ISSUES TO BE RAISED

Pursuant to the Court’s Order dated July 29, 2022, Appellant International Union, United Mine Workers of America (“UMWA”), through undersigned counsel, hereby submits the following Statement of Issues to be Raised in this appeal of the United States District Court for the District of Columbia (“District Court”) July 8, 2022 Order and the District Court’s July 8, 2022 accompanying Memorandum

Opinion. Without waiving any rights to raise additional issues, Appellant sets forth the following issues:

1. Whether Appellant UMWA has standing pursuant to Article III of the United States Constitution to seek enforcement and/or confirmation of the underlying arbitration award.
2. Whether Appellant UMWA is entitled to judicial enforcement and/or confirmation of the underlying arbitration award.

Respectfully submitted,

Deborah Stern

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Dated: August 26, 2022

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **STATEMENT OF ISSUES TO BE RAISED** was served on Appellees on August 26, 2022, by using the Court's CM/ECF electronic filing system, which will send notice to counsel of record:

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